

The following comment transcription is from oral testimony taken April 7, 2016 at a public hearing held as a webinar.

Name: Melvin Oleson

Organization: Citizen

“Melvin Oleson. I’m a certified professional in stormwater quality with, uh, twenty seven years of experience in the field. And I’m retired and I don’t represent anybody except for myself.

Uh, I wish to comment on two particular items. One is a comment dealing with the use of narrative criteria for periodic, uh, discharges as is identified in the CSO section of this permit. Uh, proposed rule, I should say. Uh, I believe that, um, limiting the the [sic] narrative capability to CSOs rather than to stormwater in general is, um, inappropriate. Stormwater is also periodic. Uh, and while we may have a lot of water in Western Washington, it’s particularly periodic in Eastern Washington. And during the summer it can be very periodic with storm events such as thunderstorms and that sort of thing. So I want to as Ecology to re-look at that criteria and apply it more broadly so that narrative criteria is available to all types of stormwater discharges, not just CSOs.

Uh, the second issue I’d like to bring up has to do with the, um application of the Clean Water Act in this particular situation. Um, I have been looking at some of the cost data that is available from prior activities, uh, going back to the original rule and I see that, uh, even under best criteria that this rule will eventually, if not immediately, create a significant cost impact on businesses, municipalities, wastewater treatment districts, uh, farmers, and a variety of other individuals.

These costs, while not directly accessible in developing a criteria do need to be looked at in the broader context of the goal of the Clean Water Act which is, as noted in slide 11, to, uh, protect public health. Um, if we take a very close look at that we’ll realize they’re limited resources by nature of all, uh, enterprises, including government, we’re going to start seeing that, uh, this rule will actually degrade public health, not improve it. The current standard that’s being proposed, of one in a million additional cancer risk, not death, risk, is, um, laudable except for if you look at a study done by the National Institute of Health. They’ve identified that, for a two percent – correction, six percent – reduction in funding of national of health institutes, you can have up to forty three additional deaths per year from, uh, for every hundred thousand people.

So, if we’re looking at the kind of reductions that could be expected by these extremely expensive, uh, treatment systems that would be necessary to meet these ridiculously, pardon me, these very low limits, uh, I would expect that we would find that there is a much greater risk to public health by having, uh, these rules imposed, um, instead of a more reasonable set of criteria which would look at a, uh, better risk factor, such as ten to the minus fourth or ten to the minus fifth.

Um, those are my comments. Thank you.”